

Timothy J. Lamb
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Attorneys for Plaintiff

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA**

CONOCOPHILLIPS ALASKA, INC.,)

Plaintiff,)

v.)

FORREST WRIGHT; AMANDA WRIGHT;)

NATHAN KEAYS; KELLY KEAYS;)

ECO EDGE ARMORING, LLC; DAVID)

BENEFIELD; WRIGHT CAPITAL)

INVESTMENTS, LLC; and DB OILFIELD)

SUPPORT SERVICES)

Defendants.)

Case No. 3:19-CV-00311-SLG

**DECLARATION OF TIMOTHY J. LAMB IN SUPPORT OF
MOTION FOR EXPEDITED CONSIDERATION OF
MOTION FOR TELEPHONIC APPEARANCE**

Pursuant to Local Civil Rule 7.3(a), the undersigned attorney provides this declaration in support of ConocoPhillips' Motion for Expedited Consideration of Motion for Telephonic Appearance.

1. I am the attorney representing ConocoPhillips in this matter.

2. Good cause exists for expedited determination because the motion must be decided before the hearing scheduled for December 26, 2019.
3. I have made no efforts to resolve this matter with defendants. Defendants have not yet entered any appearance in this case. I do not know if they are represented by counsel, or who that counsel might be. Direct contact by ConocoPhillips' attorney with the Defendants would raise serious ethical concerns.
4. On this date, service of this motion and the underlying motion is being attempted by email. ConocoPhillips' records reveal email addresses for Forrest Wright, David Benefield, Nathan Keays, and Eco Edge Armoring. Copies of this motion will be sent to the following email addresses:

- a. Forrestwright8@hotmail.com
- b. Nathan@ecoedgearmoring.com
- c. DBoilfieldSS@gmail.com

Copies will also be mailed to the known addresses for the defendants,

including:

- a. DB Oilfield Support Services
15030 East 253rd Street South
Webber Falls, OK
- b. Nathan Keays, Kelly Keays, and Eco Edge Armoring, LLC
800 E Dimond Blvd, Suite 193-464
Anchorage AK 99515.
and
14391 Canyon Rd.
Anchorage, AK 99516-6980

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This is the address given to ConocoPhillips by Eco Edge Armoring. It is also the address used by Nathan Keays and Kelly Keays on public records in connection with their purchases of real property.

Forrest and Amanda Wright
1901 Colony Place
Anchorage AK 99507

ConocoPhillips will attempt personal service on the Wrights at this address as well.

5. Service of all documents filed in this matter is also currently being attempted.

Process servers in Nevada, Oklahoma, and Alaska are being contacted currently to assist in personal service of all documents. Service is also being attempted by certified mail.

DATED this 16th day of December, 2019, at Anchorage, Alaska.

DELANEY WILES, INC.
Attorneys for ConocoPhillips Alaska, Inc.

s/Timothy J. Lamb
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4826-3837-6367, v. 1

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